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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Revision of the Commission's Rules) CC Docket No. 94-102
to Ensure Compatibility With)
Enhanced 911 Emergency Calling) RM-8143
Systems)

To: The Commission

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REPLY OF COMSAT CORPORATION

COMSAT Corporation ("COMSAT"), hereby submits its Reply to comments filed by AMSC Subsidiary Corporation ("AMSC") on October 8, 1996, in the above-referenced proceeding.

AMSC's comments address the petition filed by the United States Coast Guard¹ seeking partial reconsideration of the *First Report and Order*² adopted in this proceeding. In its *First Report and Order*, the Commission decided not to impose requirements for enhanced 911 service on Mobile Satellite Service ("MSS") providers at this time.³ The Coast Guard requests that the Commission reconsider this decision and urges it to continue the process of reviewing standards for the provision of emergency communications by MSS systems through the issuance of a further notice of proposed rulemaking. AMSC states that it has no

¹ Coast Guard Petition for Partial Reconsideration, CC Docket No. 94-102, filed Aug. 30, 1996 ("Petition").

² *First Report and Order* (FCC 96-264), CC Docket No. 94-102, released July 26, 1996 ("Order").

³ *Id.* at para. 83.

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objection to the FCC's continuing consideration of this matter, either through the issuance of a further notice, or through some other mechanism, such as an industry advisory group.⁴

COMSAT fully appreciates the concerns articulated by the Coast Guard regarding the need for extension of enhanced 911 emergency calling services to domestic MSS telecommunications users. As the designated U.S. Signatory to the International Mobile Satellite Organization ("Inmarsat"), COMSAT has considerable experience in the provision of satellite-based global maritime distress and safety services ("GMDSS"), and participates in the joint government/industry advisory group on the Safety of Life at Sea ("SOLAS"). We also have been working closely with the Federal Aviation Administration, Inmarsat and the International Civil Aeronautical Organization on the provision of aeronautical safety services. Based on this experience, COMSAT recognizes the utility of mobile radio services in providing distress and safety communications and the benefits derived from a coordinated approach to safety issues.

Accordingly, COMSAT has no objection to the FCC's encouragement of, and involvement in, a continuing dialogue between the domestic MSS industry and public safety agencies regarding the development of mutually acceptable emergency access services, perhaps through the creation of an industry advisory

⁴ Comments of AMSC, CC Docket No. 94-102, filed Oct. 8, 1996, at 1-2.

committee as suggested by AMSC. An industry advisory committee could provide a forum for further consideration of MSS safety standards, taking into account the Coast Guard's concerns, the current state of MSS technology, existing international standards, and the need for coordination with international standards bodies.

However, as our Comments and Reply Comments in this proceeding indicate, we do not believe that it is appropriate, or otherwise in the public interest, for the Commission to unilaterally extend its enhanced 911 rules to existing global MSS offerings, such as those provided by COMSAT.⁵ As the Commission recognized in its *Order*, the need to coordinate with international standards bodies and the current state of MSS technology pose real obstacles to the immediate deployment of enhanced 911 systems by MSS.⁶ For that reason, the Commission concluded that it should not impose its enhanced 911 requirements on MSS at this time, but would urge MSS and other interested parties to develop appropriate emergency access systems as soon as feasible. COMSAT believes that this decision represents an appropriate balancing of the interests involved.

⁵ Comments of COMSAT, CC Docket No. 94-102, filed January 9, 1995, at 3-8; Reply of COMSAT, CC Docket No. 94-102, filed March 17, 1995, at 3-4.


⁶ *Order* at para. 83.

For the reasons set forth above, the Commission should refrain from reconsidering its decision not to impose enhanced 911 requirements on MSS at this time, but should consider establishing an industry advisory group to facilitate further consideration of 911 compatibility issues for domestic MSS service providers.

Respectfully submitted,

COMSAT Corporation

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October 18, 1996

CERTIFICATE OF SERVICE

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